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June 11, 2020


Application GRANTED.

SO ORDERED.  
June 11, 2020.

VIA ECF FILING

Hon. P. Kevin Castel, United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York NY 10007

**Re: United States v. Grasso et al., 20-CR-00163 (PKC)**

  
P. Kevin Castel  
United States District Judge

Dear Judge Castel:

I write on behalf of my client, Connor Flynn, to respectfully request that the Court modify the current bail conditions, which restrict Mr. Flynn's travel to the Southern and Eastern Districts of New York.

We seek to modify the travel conditions to allow Mr. Flynn and his family to travel to the Western District of Michigan (by car) from on, or about, July 4, 2020, to on, or about, July 12, 2020.

Mr. Flynn's wife's parents reside in Dorr Michigan, which is within the Western District of Michigan, and Mr. Flynn seeks this travel modification so that he may take his two-year-old daughter and pregnant wife to visit Mrs. Flynn's parents and grandmother.

I have corresponded with Andrew Adams Esq. on behalf of the government and he has graciously consented to the request.

Respectfully submitted,

/s/

Andrew J. Mollica  
On Behalf of Connor Flynn

SO ORDERED:

Honorable P. Kevin Castel  
United States District Judge